INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

August 11, 2003

TO: Interested Parties / Applicant

RE: BP Products North America-Granger Terminal F141-16296-00016

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

BP Products North America - Granger Terminal
12694 Adams Road
Granger, Indiana 46530

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F141-16296-00016	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 11, 2003 Expiration Date: August 11, 2008

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary bulk petroleum storage and transfer terminal.

Authorized individual:	Area Operations Manager, Central Area
Source Address:	12694 Adams Road, Granger, IN 46530
Mailing Address:	28100 Torch Parkway, Warrenville, OH 60555
General Source Phone:	(574) 272 2800
SIC Code:	5171
Source Location Status:	St. Joseph Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) 1,722,000 gallon capacity petroleum distillates vertical fixed roof storage tank, identified as Tank 1, constructed in 1953, exhausting at one emission point identified as S1.

(b) One (1) 2,179,800 gallon capacity petroleum distillates vertical fixed roof storage tank, identified as Tank 3, constructed in 1953, exhausting at one emission point identified as S3.

(c) One (1) 613,200 gallon capacity petroleum distillates vertical fixed roof storage tank, identified as Tank 6, constructed in 1960, exhausting at one emission point identified as S5.

(d) One (1) 2,646,000 gallon capacity petroleum product (gasoline) domed external floating roof storage tank, identified as Tank 2, constructed in 1953, exhausting at one emission point identified as S2.

(e) One (1) 1,705,200 gallon capacity petroleum product (gasoline) domed external floating roof storage tank, identified as Tank 4, constructed in 1953, exhausting at one emission point identified as S4.

(f) One (1) 1,680,000 gallon capacity petroleum product (gasoline) domed external floating roof storage tank, identified as Tank 7, constructed in 1970, exhausting at one emission point identified as S6.

(g) One (1) horizontal fixed roof slop storage tank, identified as Tank T-10, with a maximum storage capacity of 6,000 gallons (constructed in 1980).

(h) One (1) horizontal fixed roof diesel additive tank, identified as Tank T-20, with a maximum storage capacity of 6,000 gallons (constructed in 1997).

(i) One (1) tank truck loading rack (identified as Loading Rack) used to load gasoline and distillates, with two loading bays capable of bottom loading products, controlled by one (1) carbon adsorption gasoline vapor recovery unit, identified as EU VRU, and exhausting through one (1) stack identified as V8 (constructed in 1995).

(j) One (1) soil vapor extraction system, identified as North System, with a gas flow rate of 2,000 actual cubic feet per minute, equipped with one (1) recuperative catalytic incineration system for VOC emissions control, rated at approximately 1.0 million Btu per hour (MMBtu/hr), burning either propane or natural gas fuel, and exhausting through one (1) stack (constructed in 1993).
Note: One of the soil vapor extraction systems, identified as South system, and permitted in the original FESOP 141-5556-00016, has been removed from the source.

(k) Two (2) ground water remediation air stripping systems each rated at 1,000 gallons per minute and gas flow rate at 7,200 actual cubic feet per minute (acfm), each exhausting through one (1) stack identified as S/V 001A and 001B, respectively.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  (1) Two (2) box style diesel additive tanks, identified as Tank 9 and 9a, each with a maximum storage capacity of 350 and 550 gallons, respectively (constructed in 1996).
  (2) One (1) horizontal fixed roof well recovery storage tank, identified as Tank T-11, with a maximum storage capacity of 1,000 gallons (constructed in 1990).
  (3) One (1) red dye additive tank, identified as Tank 19, with a maximum storage capacity of 350 gallons (constructed in 1996).
  (4) One (1) horizontal fixed roof motor oil storage tank, identified as Tank T-13, with a maximum storage capacity of 1,000 gallons (constructed in 1991).

(b) Other categories with emissions below insignificant thresholds (i.e. less than 3 pounds per hour VOC).
  (1) One (1) horizontal fixed roof gasoline detergent additive storage tank, identified as Tank T-8, with a maximum storage capacity of 3,000 gallons (constructed in 1986).
  (2) One (1) well recovery storage tank, identified as Tank T-12, with a maximum storage capacity of 5,000 gallons (constructed in 1996).
  (3) Three (3) horizontal fixed roof remediation recover storage tanks, identified as Tank T-14, T-15, and T-16, each with a maximum storage capacity of 8,000 gallons (constructed in 1986).
  (4) Two (2) storm water storage tanks, identified as Tank T-17 and T-18, each with a maximum storage capacity of 12,000 gallons with no VOC emissions (constructed in 1990).

(c) One (1) ground water recovery system consisting of six (6) recovery wells and three (3) barrier wells.

(d) One (1) oil/water separator.

(e) Maintenance activities.

(f) Fugitive VOC emissions from pumps, valves, flanges, etc.

(g) Paved and unpaved roads and parking lots with public access.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Telephone No.: 574-245-4870 (Northern Regional Office)
Facsimile No.: 574-245-4877

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ , may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ , by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ , to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ , at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ , may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ , any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ , in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (PSD);

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) 1,722,000 gallon capacity petroleum distillates vertical fixed roof storage tank, identified as Tank 1, constructed in 1953, exhausting at one emission point identified as S1.

(b) One (1) 2,179,800 gallon capacity petroleum distillates vertical fixed roof storage tank, identified as Tank 3, constructed in 1953, exhausting at one emission point identified as S3.

(c) One (1) 613,200 gallon capacity petroleum distillates vertical fixed roof storage tank, identified as Tank 6, constructed in 1960, exhausting at one emission point identified as S5.

(d) One (1) 2,646,000 gallon capacity petroleum product (gasoline) domed external floating roof storage tank, identified as Tank 2, constructed in 1953, exhausting at one emission point identified as S2.

(e) One (1) 1,705,200 gallon capacity petroleum product (gasoline) domed external floating roof storage tank, identified as Tank 4, constructed in 1953, exhausting at one emission point identified as S4.

(f) One (1) 1,680,000 gallon capacity petroleum product (gasoline) domed external floating roof storage tank, identified as Tank 7, constructed in 1970, exhausting at one emission point identified as S6.

(g) One (1) horizontal fixed roof slop storage tank, identified as Tank T-10, with a maximum storage capacity of 6,000 gallons (constructed in 1980).

(h) One (1) horizontal fixed roof diesel additive tank, identified as Tank T-20, with a maximum storage capacity of 6,000 gallons (constructed in 1997).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

(a) The annual throughput of petroleum products (gasoline) through domed external floating roof tanks No. 2, 4 and 7 shall be limited to 177,200,968 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC, single HAP, and total HAPs emissions of 4.44, 0.163, and 0.254 tons per year, respectively.

(b) The total throughput of distillates through vertical fixed roof storage tanks No. 1, 3 and 6 shall be limited to 400,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC, single HAP, and total HAPs emissions of 2.96, 0.211, and 0.518 tons per year, respectively.

Compliance with above throughput limits in conjunction with the requirements of Conditions D.2.2, D.3.1, and D.4.1 shall limit source wide emissions of VOC, worst case single HAP, and total HAPs to less than 100, 10, and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 326 IAC 2-7, and 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3, Tank Nos. 2, 4 and 7 are subject to the following:

(a) The facility must be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.

(b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

(c) All openings, except stub drains, are equipped with covers, lids, or seals such that:

(1) the cover, lid, or seal is in the closed position at all times except when in actual use;

(2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;

(3) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to these emission units.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.3 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC and HAP emission limits established in Condition D.1.1.

(1) The amount of total petroleum products (gasoline) and/ distillate throughput per month from storage tanks. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of loading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred.

(2) Total amounts of petroleum products (gasoline) and distillate throughput for 12 consecutive month period from storage tanks.

(b) The Permittee shall comply with the record keeping requirements of 326 IAC 8-4-3. The following records are required for tank Nos. 2, 4 and 7:

(1) The types of volatile petroleum liquids stored,

(2) The maximum true vapor pressure of the liquids stored, and

(3) The results of the inspections performed on the tanks.

Such records will be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(i) One (1) tank truck loading rack (identified as Loading Rack) used to load gasoline and distillates, with two loading bays capable of bottom loading products, controlled by one (1) carbon adsorption gasoline vapor recovery unit, identified as EU VRU, and exhausting through one (1) stack identified as V8 (constructed in 1995).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60.500, Subpart XX.

D.2.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

(a) The loading of petroleum products (gasoline) through the truck loading rack shall be limited to 177,200,968 gallons of gasoline per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to limited VOC, single HAP, and total HAPs emissions of 31.42, 0.95, and 1.49 tons per year (including fugitive emissions), respectively, based on the vapor recovery unit (VRU) controlling VOC emission with an over all control efficiency of 95.71%.

(b) The loading of distillates through the truck loading rack shall be limited to 400,000,000 gallons of distillate per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC, single HAP, and total HAPs emissions of 3.09, 0.22, and 0.54 tons per year (including fugitive emissions), respectively, without being controlled by the VRU.

Compliance with above limits in conjunction with the requirements of Conditions D.1.1, D.3.1, and D.4.1 shall limit source wide emissions of VOC, worst case single HAP, and total HAPs to less than 100, 10, and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 326 IAC 2-7, and 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.500, Subpart XX] [326 IAC 2-8-4]

Pursuant to 40 CFR 60.502, Subpart XX, this rule requires:

(a) The VOC emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks shall not exceed 35 milligrams of total organic compounds per liter of gasoline loaded, except as noted in paragraph (c) of 40 CFR 60.502.

(b) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

(c) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4, the Permittee shall not permit the loading of gasoline into any transport unless:

(a) The gasoline loading equipment is equipped with a vapor control system in good working order, which will control VOC emissions to the atmosphere from the equipment being controlled to no more than 80 milligrams per liter of gasoline loaded.

(b) Displaced vapors and gases are vented only to the vapor control system.

(c) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(d) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

If employees of the owner of the source are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the source shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this rule.

Compliance with the VOC emission limit of 35 milligrams of total organic compounds per liter of gasoline loaded, pursuant to 40 CFR 60.502, Subpart XX, shall ensure compliance with the VOC emission limit of 80 milligrams per liter of gasoline loaded.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9, the Permittee shall:

(a) Ensure the following requirements are met, before allowing a gasoline transport subject to this rule to be filled or emptied :

(1) The gasoline transport is tested annually according to test procedures consistent with Appendix A of “Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems”, EPA-450/2-78-051, or equivalent procedure approved by the commissioner.

(2) The gasoline transport sustains a pressure change of no more than seven hundred fifty (750) pascals in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) pascals or evacuated to a gauge pressure of one thousand five hundred (1,500) pascals during the testing required in (a) (1).

(3) The gasoline transport is repaired by the owner or operator of the transport and retested within fifteen (15) days of testing if it does not meet the criteria of (a) (2).

(4) The gasoline transport displays a sticker which shows the date that the gasoline tank truck last passed the test required in (a) (1) through (a) (2). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.

(b) The owner of the transport shall be responsible for compliance with subsection (a). The Permittee shall take all reasonable steps to ensure that transports loading at its facility comply with subsection (a), and shall, in all cases when its employees are present to supervise or perform loading, be responsible for compliance with (a)(4).

(c) The Permittee, which owns and operates a vapor control system subject to this rule shall:

(1) Design and operate the applicable system and the gasoline loading equipment in a manner that prevents:

(A) gauge pressure from exceeding four thousand five hundred (4,500) pascals and a vacuum from exceeding one thousand five hundred (1,500) pascals in the gasoline tank truck;

(B) a reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL, measured as propane) at two and five-tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in Appendix B of "Control of Organic Compound leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by IDEM during loading or unloading operations; and

(C) avoidable visible liquid leaks during loading or unloading operations.

(2) Repair and retest a vapor collection or control system that exceeds the limits in (c) (1) within fifteen (15) days.

(d) The IDEM, OAQ staff may, at any time monitor a gasoline tank truck, vapor balance referenced, to confirm continuing compliance with subsection (a) or (b).

(e) If IDEM, OAQ allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.

D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.7 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.500, Subpart XX]

Pursuant to 40 CFR 60.502, Subpart XX, this rule requires:

(a) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.

(b) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.

(c) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

(1) The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.

(2) The Permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the affected facility within 3 weeks after the loading has occurred.

(3) The Permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.

(4) Alternate procedures to those described in paragraphs (e)(1) through (5) of 40 CFR 60.502 for limiting gasoline tank truck loadings may be used upon application to, and approval by, the IDEM, OAQ.

(d) The Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

(e) The Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.

(f) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

D.2.8 VOC and HAPs

In order to comply with Conditions D.2.2(a) and D.2.3, the Vapor Recovery Unit (VRU) for loading rack VOC and HAPs control shall be in operation and control emissions from the loading rack at all times when gasoline tank trucks are being loaded.

D.2.9 Testing Requirements [326 IAC 2-8-5(1)] [40 CFR 60.500, Subpart XX] [326 IAC 12]

(a) Immediately before the performance test required to determine compliance with 40 CFR 60.502 (b), (c), and (h), the Permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The Permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

(b) During the period between November 28, 2005 and May 28, 2006 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days, the Permittee shall determine compliance with the VOC standards in 40 CFR 60.502 (b) and (c) using the testing procedures pursuant to 40 CFR 60.503 (c)(1) through (7).

(c) During the period between November 28, 2005 and May 28, 2006 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days, the Permittee shall determine compliance with the standard in 40 CFR 60.502 (h) using the testing procedures pursuant to 40 CFR 60.503 (d)(1) and (2).

(d) These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.10 Monthly Visible Checks for Liquid and Vapor Leaks

(a) Monthly checks for liquid and vapor leaks during loading or unloading operations of the Loading Rack, the vapor collection system and the vapor recovery unit (VRU) shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid and vapor leaks and the date of such leaks.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(f) All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.11 Record Keeping Requirements

(a) To document compliance with Condition D.2.2 the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC and HAP emission limits established in Condition D.2.2.

(1) The amount of petroleum products (gasoline) and distillates loaded each month. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of lading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred;

(2) Total amounts of petroleum products (gasoline) and distillate throughput for 12 consecutive month period from storage tanks.

(b) To document compliance with Condition D.2.5 the Permittee shall maintain records in accordance with (1) below.

(1) The Permittee shall maintain records of all certification testing and repairs. The records must identify the following:

(A) The gasoline tank truck, vapor collection system, or vapor control system.

(B) The date of the test or repair.

(C) If applicable, the type of repair and the date of retest.

The records must be maintained in a legible, readily available condition for at least two (2) years after the date the testing or repair was completed.

(c) To document compliance with Condition D.2.10, the Permittee shall maintain records of monthly checks for liquid and vapor leaks of the Loading Rack and VRU stack exhaust.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.12 Record Keeping Requirements [Subpart XX, 40 CFR 60.505] [326 IAC 12-1]

(a) To document compliance with Condition D.2.3 the Permittee shall maintain records in accordance with (1) and (2) below.

(1) The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.

(2) The Permittee shall cross-check each tank identification number obtained in paragraph (e)(2) of 40 CFR 60.502 with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.

(b) The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.

(c) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:

(1) Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.
(2) Tank owner and address.
(3) Tank identification number.
(4) Testing location.
(5) Date of test.
(6) Tester name and signature.
(7) Witnessing inspector, if any: Name, signature, and affiliation.
(8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).

(d) A record of each monthly leak inspection required under 40 CFR 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:

(1) Date of inspection.
(2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
(3) Leak determination method.
(4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
(5) Inspector name and signature.

(e) The terminal owner or operator shall keep documentation of all notifications required under 40 CFR 60.502(e)(4) on file at the terminal for at least 2 years.

(f) The Permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(j) One (1) soil vapor extraction system, identified as North System, with a gas flow rate of 2,000 actual cubic feet per minute, equipped with one (1) recuperative catalytic incineration system for VOC emissions control, rated at approximately 1.0 million Btu per hour (MMBtu/hr), burning either propane or natural gas fuel, and exhausting through one (1) stack (constructed in 1993).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

The total daily influent to one (1) vapor extraction system shall be limited to 2,000 actual cubic feet per minute. This is equivalent to limited VOC, single HAP, and total HAPs emissions of 2.74, 0.10, and 0.157 tons per year, respectively, based on the recuperative catalytic incineration system controlling VOC/HAP emissions with an over all capture efficiency of 98.0%.

Compliance with this limit in conjunction with the requirements of Condition D.1.1, D.2.2, and D.4.1, shall limit source wide emissions of VOC, worst case single HAP, and total HAPs to less than 100, 10, and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 326 IAC 2-7, and 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-8-4]

Pursuant to 326 IAC 8-1-6, VOC emissions from soil vapor extraction system (North System) shall be controlled by the recuperative catalytic incineration system for VOC emissions control with minimum overall control efficiency of 98.0%.

Compliance with condition D.3.1 shall also satisfy the requirements of 326 IAC 8-1-6.

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.4 Volatile Organic Compound Control

The recuperative catalytic incineration system shall be in operation at all times when the one (1) soil vapor extraction system (North System) is in operation.

When operating the one (1) soil vapor extraction system (North System), the recuperative catalytic incineration system shall operate with a minimum catalyst inlet temperature of 600 ºF to maintain a minimum destruction efficiency of 98.0 percent (weight) of captured volatile organic compounds. Compliance with this condition shall deem 326 IAC 8-1-6 and 326 IAC 2-8 satisfied.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.5 Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the recuperative catalytic incineration system for measuring the catalyst inlet temperature. The temperature of the catalyst shall be recorded, and that temperature shall be greater than or equal to 600 °F

(b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation, Records, and Reports shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.6 Record Keeping Requirements

(a) The Permittee shall maintain records at the source of the catalyst inlet temperature for the recuperative catalyst incineration system. The records shall be complete and sufficient to establish compliance with the temperature limits and/or VOC emission limits of Condition D.3.1.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(k) Two (2) ground water remediation air stripping systems each rated at 1,000 gallons per minute and gas flow rate at 7,200 actual cubic feet per minute (acfm), each exhausting through one (1) stack identified as S/V 001A and 001B, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

The total daily influent to two (2) air strippers shall be limited to 1,300 gallons per minute of water contaminated with a maximum concentration of petroleum hydrocarbons of 4,037.5 ug/L, and 700 gallons per minute of water contaminated with a maximum concentration of 1,2-DCA of 50 ug/L. This is equivalent to VOC, single HAP, and total HAPs emissions of 11.50, 0.421, and 0.658 tons per year, respectively.

Compliance with this limit in conjunction with the requirements of Conditions D.1.1, D.2.2, and D.3.1, shall limit source wide emissions of VOC, worst case single HAP, and total HAPs to less than 100, 10, and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 326 IAC 2-7, and 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

Compliance Determination Requirement

There are no specific compliance determination requirements applicable to these facilities.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific compliance monitoring requirements applicable to these facilities.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.4.2 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.4.1.

(1) Monthly throughput of petroleum hydrocarbon and 1,2 DCA contaminated water processed by the strippers and monthly data on the influent VOC concentration.

(2) Monthly throughput of contaminated storm water processed by the strippers and monthly data on the influent VOC concentration.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (1) Two (2) box style diesel additive tanks, identified as Tank 9 and 9a, each with a maximum storage capacity of 350 and 550 gallons, respectively (constructed in 1996).
- (2) One (1) horizontal fixed roof well recovery storage tank, identified as Tank T-11, with a maximum storage capacity of 1,000 gallons (constructed in 1990).
- (3) One (1) red dye additive tank, identified as Tank 19, with a maximum storage capacity of 350 gallons (constructed in 1996).
- (4) One (1) horizontal fixed roof motor oil storage tank, identified as Tank T-13, with a maximum storage capacity of 1,000 gallons (constructed in 1991).

(b) Other categories with emissions below insignificant thresholds (i.e. less than 3 pounds per hour VOC).
- (1) One (1) horizontal fixed roof gasoline detergent additive storage tank, identified as Tank T-8, with a maximum storage capacity of 3,000 gallons (constructed in 1986).
- (2) One (1) well recovery storage tank, identified as Tank T-12, with a maximum storage capacity of 5,000 gallons (constructed in 1996).
- (3) Three (3) horizontal fixed roof remediation recover storage tanks, identified as Tank T-14, T-15, and T-16, each with a maximum storage capacity of 8,000 gallons (constructed in 1986).
- (4) Two (2) storm water storage tanks, identified as Tank T-17 and T-18, each with a maximum storage capacity of 12,000 gallons with no VOC emissions (constructed in 1990).

(c) One (1) ground water recovery system consisting of six (6) recovery wells and three (3) barrier wells.

(d) One (1) oil/water separator.

(e) Maintenance activities.

(f) Fugitive VOC emissions from pumps, valves, flanges, etc.

(g) Paved and unpaved roads and parking lots with public access.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

Total VOC, single HAP, and total HAPs emissions from the insignificant activities consist of 5.64, 0.206, and 0.323 tons per year, respectively.

Source wide emissions of VOC, worst case single HAP, and total HAPs (including all the facilities in the insignificant category) shall be limited to less than 100, 10, and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 326 IAC 2-7, 326 IAC 2-2, and 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

Compliance Determination Requirement

There are no specific compliance determination requirements applicable to these facilities.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific compliance monitoring requirements applicable to these facilities.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no specific record keeping and reporting requirements applicable to these facilities.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: BP Products North America - Granger Terminal
Source Address: 1694 Adams Road, Granger, IN 46530
Mailing Address: 12694 Adams Road, Granger, IN 46530
FESOP No.: F141-16296-00016

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: BP Products North America - Granger Terminal
Source Address: 1694 Adams Road, Granger, IN 46530
Mailing Address: 12694 Adams Road, Granger, IN 46530
FESOP No.: F141-16296-00016

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: BP Products North America - Granger Terminal
Source Address: 1694 Adams Road, Granger, IN 46530
Mailing Address: 12694 Adams Road, Granger, IN 46530
FESOP No.: F141-16296-00016
Facility: Storage Tanks (1, 2, 3, 4, 6 and 7)
Parameter: Petroleum products (gasoline) and distillate throughputs
Limit: (a) The annual throughput of petroleum products (gasoline) through domed external floating tanks No. 2, 4 and 7 shall be limited to 177,200,968 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.
(b) The total throughput of distillates through vertical fixed roof storage tanks No. 1, 3 and 6 shall be limited to 400,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR_____

Fuel Type	Month: _____			Month: _____			Month: _____		
	Column 1	Column 2	Column 1 +2	Column 1	Column 2	Column 1 +2	Column 1	Column 2	Column 1 +2
	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput
Petroleum Products (Gasoline) (Tanks 2 4, and 7)									
Distillates (Tanks 1, 3, and 6)									

9 No deviation occurred in this month.
9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: BP Products North America - Granger Terminal
Source Address: 1694 Adams Road, Granger, IN 46530
Mailing Address: 12694 Adams Road, Granger, IN 46530
FESOP No.: F141-16296-00016
Facility: One (1) truck loading rack
Parameter: Petroleum products (gasoline) and distillate throughputs
Limit: Petroleum Products (gasoline) throughput: 177,200,968 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. Distillates throughput: 400,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Fuel Type	Month: _____			Month: _____			Month: _____		
	Column 1	Column 2	Column 1 +2	Column 1	Column 2	Column 1 +2	Column 1	Column 2	Column 1 +2
	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput
Petroleum Products (Gasoline) (Tanks 2 4, and 7)									
Distillates (Tanks 1, 3, and 6)									

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: BP Products North America - Granger Terminal
Source Address: 1694 Adams Road, Granger, IN 46530
Mailing Address: 12694 Adams Road, Granger, IN 46530
FESOP No.: F141-16296-00016

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ____________________________________

Title/Position: ____________________________________

Date: ____________________________________

Phone: ____________________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: BP Products North America - Granger Terminal
Source Location: 12694 Adams Road, Granger, Indiana 46530
County: St. Joseph
SIC Code: 5171
Operation Permit No.: F141-16296-00016
Permit Reviewer: Adeel Yousuf / EVP

On June 13, 2003, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that BP Products North America - Granger Terminal had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for the operation of a bulk petroleum product storage and transfer terminal. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

On July 10, 2003, Anisa N. Ali of BP Products North America submitted comments on the proposed FESOP renewal permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

D.1.2 (c) (2) Internal floating roofs on occasion are landed due to RVP Phasedown and for tank maintenance. When the roof is landed the emission control of the floating roof is not in effect. We are unclear if the verbiage in this section includes this type of situation. Additionally C.7 indicates that pollution control equipment is to be operational at all times. During this situation the control equipment is nonoperation. Please keep in mind that BP has very strict procedures for landing any floating roof and the amount of time a roof is landed is minimized as much as possible for both safety and environmental concerns. Emissions from these roof landings are reported annually in the facility's annual emission report.

Response 1

IDEM, OAQ considers the storage tank to be empty during the storage tank roof landing, recognizing there are still fugitive VOC emissions from any residual materials that continues to remain in the tank upon roof landing. That not withstanding, IDEM, OAQ does not consider roof landing to be a normal operation of the storage tank. Therefore, the emission unit or storage tank in this situation, is not considered in operation and is considered to satisfy the requirements of Condition C.7 (Operation of Equipment). Additionally, the source confirmed that there are only a maximum of two (2) roof landings per year with fugitive VOC emissions no more than 1 ton per year. This fugitive VOC emission rate of 1 ton per year is already included in the total uncontrolled potential VOC emissions of 8.14 tons per year from all the storage tanks at the source (See TSD Appendix A, page 2 of 9).

Comment 2

D.2.2 (a) The last sentence currently reads "This is equivalent to limited VOC, single HAP, and total HAPs emissions of 31.42, 0.95, and 1.49 tons per year (including fugitive emissions), respectively, based on the vapor recovery unit (VRU) controlling VOC emission with an overall capture efficiency of 99.12%." The last part of this sentence is mis-stated and should read "…based on the vapor recovery unit (VRU) controlling VOC emission with an over all control efficiency of 95.71%. " Appendix A page 4 of 9 indicates the control efficiency of the VRU is 95.71 based on potential to emit calculations which assume the maximum VRU emission limit of 30 mg/L of VOC.

Response 2

Condition D.2.2 has been revised to indicate the correct overall control efficiency instead of the capture efficiency.

D.2.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

(a) The loading of petroleum products (gasoline) through the truck loading rack shall be limited to 177,200,968 gallons of gasoline per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to limited VOC, single HAP, and total HAPs emissions of 31.42, 0.95, and 1.49 tons per year (including fugitive emissions), respectively, based on the vapor recovery unit (VRU) controlling VOC emission with an over all ~~capture~~ **control** efficiency of ~~99.12~~ **95.71**%.

Comment 3

D.2.5(b) There is a reference error in the second sentence of this condition. The second sentence should read "The Permittee shall take all reasonable steps to ensure that transports loading at its facility comply with subsection (a), and shall, in all cases when its employees are present to supervise or perform loading, be responsible for compliance with (a)(4).

Response 3

Condition D.2.5 has been revised as follows to reference the correct subsection.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9, the Permittee shall:

(b) The owner of the transport shall be responsible for compliance with subsection (a). The Permittee shall take all reasonable steps to ensure that transports loading at its facility comply with subsection (~~b~~**a**), and shall, in all cases when its employees are present to supervise or perform loading, be responsible for compliance with (a)(4).

Comment 4

D.2.8 The last part of the sentence should read "…when gasoline tank trucks are being loaded." This clarifies that if a truck is loading distillate, but on the previous load has gasoline, they are required to recover the gasoline vapors currently in the tank truck.

Response 4

Condition D.2.8 has been revised to include 'tank trucks' in the last sentence to clarify the language.

D.2.8 VOC and HAPs

In order to comply with Conditions D.2.2(a) and D.2.3, the Vapor Recovery Unit (VRU) for loading rack VOC and HAPs control shall be in operation and control emissions from the loading rack at all times when gasoline **tank trucks are** ~~is~~ being loaded.

Comment 5

D.2.10 All checks should be for both liquid and vapor leaks.

Response 5

Condition D.2.10 has been revised to add vapo' leaks checks as well.

D.2.10 Monthly Visible Checks for Liquid **and Vapor** Leaks

(a) Monthly checks for liquid **and vapor** leaks during loading or unloading operations of the Loading Rack, the vapor collection system and the vapor recovery unit (VRU) shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid **and vapor** leaks and the date of such leaks.

Comment 6

D.2.11(c) The sentence should read "To document compliance with Condition D.2.10, the Permittee shall maintain records of monthly checks for liquid and vapor leaks of the Loading Rack and VRU stack exhaust."

Response 6

Condition D.2.11 has been revised to be consistent with the requirements of Condition D.2.10 of having 'monthly' checks instead of 'daily' checks. Vapor leak check has been added as well.

D.2.11 Record Keeping Requirements

(c) To document compliance with Condition D.2.10, the Permittee shall maintain records of ~~daily~~ **monthly** checks for liquid **and vapor** leaks of the Loading Rack and VRU stack exhaust.

Comment 7

D.3.1 The first part of the sentence should read "2,000 actual cubic feet per minute" instead of 2,000 gallons per minute of water. The soil vapor extraction system recovers vapor from the soil, occasionally some water is drawn however the primary purpose of an vapor extraction system to recover vapor, therefore as in the above caption the units on the flowrate should be in cubic feet per minute. We would like to request that the limit on the amount of stormwater is removed from this section. The amount of stormwater runoff collected at the terminal is uncontrollable. All stormwater from potentially contaminated surfaces is collected and treated through either the recuperative catalytic incineration system or the air stripper. The proposed wording for the first sentence of D.3.1 is as follows "The daily influent to one (1) vapor extraction system shall be limited to 2,000 actual cubic feet per minute."

D.3.7 We would like to request that quarterly summary reports not be required for this system. This was not included in the previous permit condition, and is not required for the Air Stripping system either.

Response 7

Condition D.3.1 has been revised to list the correct flow rate unit in 'actual cubic feet per minute'. IDEM, OAQ agrees that the amount of stormwater collected at the source is uncontrollable, therefore, the annual stormwater influent limit is being removed from Condition D.3.1. The amount of stormwater influent can vary per annum as long as the source comply with the listed VOC, single HAP and total HAPs emissions of 2.74, 0.10, and 0.157 tons per year, respectively. Consequently, IDEM, OAQ has determined that the corresponding reporting requirement of annual stormwater influent in Condition D.3.7 is not required as the VOC emissions from the vapor extraction are limited to less than 2.74 tons per year calculated based on maximum influent rate of 2,000 actual cubic feet per minute and controlled by recuperative catalytic incineration with over all capture efficiency of 98.0%.

D.3.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

The total daily influent to one (1) vapor extraction system shall be limited to 2,000 ~~gallons~~ **actual cubic feet** per minute of ~~water and the annual influent of of storm water runoff shall be limited to 25,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month~~. This is equivalent to limited VOC, single HAP, and total HAPs emissions of 2.74, 0.10, and 0.157 tons per year, respectively, based on the recuperative catalytic incineration system controlling VOC/HAP emissions with an over all capture efficiency of 98.0%.

FESOP Quarterly Report has been removed.

~~**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**~~
~~**OFFICE OF AIR QUALITY**~~
~~**COMPLIANCE DATA SECTION**~~

~~**FESOP Quarterly Report**~~

~~Source Name: BP Products North America - Granger Terminal~~
~~Source Address: 1694 Adams Road, Granger, IN 46530~~
~~Mailing Address: 12694 Adams Road, Granger, IN 46530~~
~~FESOP No.: F141-16296-00016~~
~~Facility: One (1) soil vapor extraction system (North System)~~
~~Parameter: Storm water runoff~~
~~Limit: Annual influent of of storm water runoff shall be limited to 25,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.~~

~~YEAR: _____~~

~~Month~~	~~Column 1~~	~~Column 2~~	~~Column 1 + Column 2~~
	~~This Month~~	~~Previous 11 Months~~	~~12 Month Total~~
~~Month 1~~			
~~Month 2~~			
~~Month 3~~			

~~9 No deviation occurred in this quarter.~~

~~9 Deviation/s occurred in this quarter.~~
~~Deviation has been reported on: _____~~

~~Submitted by: _____~~
~~Title / Position: _____~~
~~Signature: _____~~
~~Date: _____~~
~~Phone: _____~~

~~Attach a signed certification to complete this report.~~

Comment 8

D.4.2(a) The permit separates subpart (a) into three sections separating petroleum hydrocarbon contaminated water, 1,2 DCA contaminated water, and contaminated stormwater. The petroleum hydrocarbon contaminated water and 1,2 DCA water is actually the same water with possibly both contaminants in it. The stormwater is considered to be from a different source and stored in different tanks. The monthly VOC and 1,2 DCA sample is taken from the combined water entering the air stripper. It is preferred that this section be written similar to the following suggestions. "(1) Monthly throughput of petroleum hydrocarbon and 1,2 DCA contaminated water processed by the stripper and monthly data on the influent VOC concentration. (2) Monthly throughput of contaminated storm water processed by the strippers and monthly data on the influent VOC concentration."

Response 8

Condition D.4.2 has been revised as follows to combine hydrocarbon and 1,2 DCA contaminated water as being the same water.

D.4.2 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.4.1.

(1) Monthly throughput of petroleum hydrocarbon **and 1,2 DCA** contaminated water processed by the strippers and monthly data on the influent VOC concentration.

~~(2) Monthly throughput of 1,2-DCA contaminated water processed by the strippers and monthly data on the influent VOC concentration.~~

(**2**~~3~~) Monthly throughput of contaminated storm water processed by the strippers and monthly data on the influent VOC concentration.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: BP Products North America - Granger Terminal
Source Location: 12694 Adams Road, Granger, Indiana 46530
County: St. Joseph
SIC Code: 5171
Operation Permit No.: F141-16296-00016
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from BP Products North America - Granger Terminal relating to the operation of a Bulk Petroleum Storage and Transfer Terminal. BP Products North America - Granger Terminal (formerly known as Amoco Oil Company - Granger Terminal) was issued FESOP 141-5556-00016 on March 9, 1998.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) 1,722,000 gallon capacity petroleum distillates vertical fixed roof storage tank, identified as Tank 1, constructed in 1953, exhausting at one emission point identified as S1.

(b) One (1) 2,179,800 gallon capacity petroleum distillates vertical fixed roof storage tank, identified as Tank 3, constructed in 1953, exhausting at one emission point identified as S3.

(c) One (1) 613,200 gallon capacity petroleum distillates vertical fixed roof storage tank, identified as Tank 6, constructed in 1960, exhausting at one emission point identified as S5.

(d) One (1) 2,646,000 gallon capacity petroleum product (gasoline) domed external floating roof storage tank, identified as Tank 2, constructed in 1953, exhausting at one emission point identified as S2.

(e) One (1) 1,705,200 gallon capacity petroleum product (gasoline) domed external floating roof storage tank, identified as Tank 4, constructed in 1953, exhausting at one emission point identified as S4.

(f) One (1) 1,680,000 gallon capacity petroleum product (gasoline) domed external floating roof storage tank, identified as Tank 7, constructed in 1970, exhausting at one emission point identified as S6.

(g) One (1) horizontal fixed roof slop storage tank, identified as Tank T-10, with a maximum storage capacity of 6,000 gallons (constructed in 1980).

(h) One (1) horizontal fixed roof diesel additive tank, identified as Tank T-20, with a maximum storage capacity of 6,000 gallons (constructed in 1997).

(i) One (1) tank truck loading rack (identified as Loading Rack) used to load gasoline and distillates, with two loading bays capable of bottom loading products, controlled by one (1) carbon adsorption gasoline vapor recovery unit, identified as EU VRU, and exhausting through one (1) stack identified as V8 (constructed in 1995).

(j) One (1) soil vapor extraction system, identified as North System, with a gas flow rate of 2,000 actual cubic feet per minute, equipped with one (1) recuperative catalytic incineration system for VOC emissions control, rated at approximately 1.0 million Btu per hour (MMBtu/hr), burning either propane or natural gas fuel, and exhausting through one (1) stack (constructed in 1993).
Note: One of the soil vapor extraction systems, identified as South system, and permitted in the original FESOP 141-5556-00016, has been removed from the source.

(k) Two (2) ground water remediation air stripping systems each rated at 1,000 gallons per minute and gas flow rate at 7,200 actual cubic feet per minute (acfm), each exhausting through one (1) stack identified as S/V 001A and 001B, respectively.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  (1) Two (2) box style diesel additive tanks, identified as Tank 9 and 9a, each with a maximum storage capacity of 350 and 550 gallons, respectively (constructed in 1996).
  (2) One (1) horizontal fixed roof well recovery storage tank, identified as Tank T-11, with a maximum storage capacity of 1,000 gallons (constructed in 1990).
  (3) One (1) red dye additive tank, identified as Tank 19, with a maximum storage capacity of 350 gallons (constructed in 1996).
  (4) One (1) horizontal fixed roof motor oil storage tank, identified as Tank T-13, with a maximum storage capacity of 1,000 gallons (constructed in 1991).

(b) Other categories with emissions below insignificant thresholds (i.e. less than 3 pounds per hour VOC).
  (1) One (1) horizontal fixed roof gasoline detergent additive storage tank, identified as Tank T-8, with a maximum storage capacity of 3,000 gallons (constructed in 1986).
  (2) One (1) well recovery storage tank, identified as Tank T-12, with a maximum storage capacity of 5,000 gallons (constructed in 1996).
  (3) Three (3) horizontal fixed roof remediation recover storage tanks, identified as Tank T-14, T-15, and T-16, each with a maximum storage capacity of 8,000 gallons (constructed in 1986).
  (4) Two (2) storm water storage tanks, identified as Tank T-17 and T-18, each with a maximum storage capacity of 12,000 gallons with no VOC emissions (constructed in 1990).

(c) One (1) ground water recovery system consisting of six (6) recovery wells and three (3) barrier wells.

(d) One (1) oil/water separator.

(e) Maintenance activities.

(f) Fugitive VOC emissions from pumps, valves, flanges, etc.

(g) Paved and unpaved roads and parking lots with public access.

Existing Approvals

The source has been operating under the following previous approvals:

(a) FESOP 141-5556-00016, issued on March 8, 1998.

(b) First Administrative Amendment 141-9822-00016, issued on May 11, 1999.

(c) Second Administrative Amendment 141-14985-00016, issued on November 2, 2001.

All terms and conditions of previous permit issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on November 4, 2002. Additional information was received on April 22, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 8).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	0.03
PM-10	0.03
SO_2	negl.
VOC	778.44
CO	0.37
NO_x	0.91

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Hexane	28.33
Benzene	2.90
Toluene	6.01
Iso-Octane	5.48
Xylenes	2.21
EthylBenzene	0.27
TOTAL	45.20

(a) The unrestricted potential emissions of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on March 9, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F141-5556-00016; issued on March 9, 1998).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Storage Tanks	--	--	--	8.14	--	--	0.21(single) 0.77 (total)
Truck Loading Rack (gasoline loading - VRU)	--	--	--	26.07	--	--	0.95 (single) 1.49 (total)
Truck Loading Rack (distillate loading)	--	--	--	3.06	--	--	0.22 (single) 0.54 (total)
Truck Loading Rack (Transport truck fugitives)	--	--	--	5.37	--	--	0.11 (single) 0.18 (total)
Two (2) Air Strippers	--	--	--	11.50	--	--	0.42 (single) 0.66 (total)
Soil Vapor Extraction System (North System)	--	--	--	2.74	--	--	0.10 (single) 0.157 (total)
Insignificant Activities	0.03	0.03	negl.	5.64	0.37	0.91	0.30 (single) 0.48 (total)
Total PTE After Issuance	0.03	0.03	negl.	< 100.00	0.37	0.91	< 10 (single) < 25 (total)

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone.

(b) St. Joseph county has been classified as attainment or unclassifiable for all other criteria pollutants.

Federal Rule Applicability

There are no new federal rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP F141-5556-00016, issued on March 9, 1998.

(a) Storage tanks identified as Tank 1, 2, 3, 4, 6 and 7 are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Parts 60.110, 110a-115a or 110b-117b, Subparts K, Ka and Kb), because these tanks were all constructed between 1953 and 1970, prior to the earliest applicability date of June 11, 1973 for Subpart K, Ka or Kb.

(b) Storage tanks identified as Tank T-8, T-10, T-12, T-14, T-15, T-16, and T-20, installed between 1980 and 1997, are not subject to the requirements of 326 IAC 12, (40 CFR Parts 60.110, 110a - 115a or 110b - 117b, as Subparts K, Ka, and Kb, respectively) since each have capacities of less than 40 cubic meters (m^3) (10,567 gallons), and are therefore not subject to this rule.

(c) Storage tanks identified as Tank T-17 and T-18 are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Parts 60.110, 110a-115a or 110b-117b, Subparts K, Ka and Kb), because these tanks do not store volatile organic compounds.

(d) Storage tanks (Tanks 9, 9a, T-11, T-13, and T-19) with capacity less than or equal to 1,000 gallons as an insignificant activity, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Parts 60.110; 110a - 115a; and 110b - 117b, as Subparts K, Ka, and Kb, respectively) since each tank's storage capacity is below the minimum applicable threshold to the three rules (i.e., 40 cubic meters (10,568 gallons)).

(e) The one (1) truck loading rack transferring gasoline and distillate, identified as Loading Rack and the vapor recovery unit (VRU) are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX) "Standards of Performance for Bulk Gasoline Terminals" because the loading rack was constructed after December 17, 1980. Pursuant to XX, this rule requires:

(1) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.

(2) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded, except as noted in paragraph (c) of 40 CFR 60.502.

(3) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.

(4) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

(i) The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.

(ii) The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.

(iii) The Permittee shall cross-check each tank identification number obtained in paragraph (e)(2) of 40 CFR 60.502 with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.

(iv) The Permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the affected facility within 3 weeks after the loading has occurred.

(v) The Permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.

(vi) Alternate procedures to those described in paragraphs (e)(1) through (5) of 40 CFR 60.502 for limiting gasoline tank truck loadings may be used upon application to, and approval by, the IDEM, OAQ.

(5) The Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

(6) The Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.

(7) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

(8) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

(9) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

The source will comply with the requirements of Subpart XX by utilizing a vapor recovery unit to control total organic compound emissions to 35 milligrams per liter of gasoline loaded. Records will also be maintained as required.

(f) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.420, Subpart R), because the source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively, by limiting the annual fuel throughput.

(g) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Generally, such requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, that meets the following criteria:

(1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) the unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

(h) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source, because the source has a limited potential to emit of less than 10 tons per year of a single HAP and less than 25 tons per year of the combination of HAPs.

State Rule Applicability - Entire Source

There are no new state rules applicable to the entire source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 141-5556-00016; issued on March 9, 1998.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not subject to the requirements of this rule. This source was constructed in 1953, prior to the rule applicability date of August 7, 1977, is not one of the 28 listed source categories and no major modifications were done, therefore, it is not subject to the requirements of the rule. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because no new or reconstructed facilities with a PTE of any single HAP at 10 tons per year or 25 tons per year of the combination HAPs have been installed since July 27, 1997. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because the source is located in St. Joseph County and it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions shall apply:

(1) The loading of petroleum products (gasoline) through the truck loading rack shall be limited to 177,200,968 gallons of gasoline per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to limited VOC, single HAP, and total HAPs emissions of 31.42, 0.95, and 1.49 tons per year (including fugitive emissions), respectively, based on the vapor recovery unit (VRU) controlling VOC emission with an over all capture efficiency of 99.12%.

(2) The loading of distillates through the truck loading rack shall be limited to 400,000,000 gallons of distillate per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC, single HAP, and total HAPs emissions of 3.09, 0.21, and 0.53 tons per year (including fugitive emissions), respectively, without being controlled by the VRU.

(3) The total throughput of petroleum products (gasoline) through domed external floating roof storage tanks No. 2, 4 and 7 shall be limited to 177,200,968 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC, single HAP, and total HAPs emissions of 4.44, 0.163, and 0.254 tons per year, respectively.

(4) The total throughput distillates through vertical fixed roof storage tanks No. 1, 3 and 6 shall be limited to 400,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC, single HAP, and total HAPs emissions of 2.96, 0.211, and 0.518 tons per year, respectively.

(5) The total daily influent to one (1) vapor extraction system shall be limited to 2,000 gallons per minute of water and the annual influent of of storm water runoff shall be limited to 25,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to limited VOC, single HAP, and total HAPs emissions of 2.74, 0.10, and 0.157 tons per year, respectively, based on the recuperative catalytic incineration system controlling VOC/HAP emissions with an over all capture efficiency of 98.0%.

(6) The total daily influent to two (2) air strippers shall be limited to 1,300 gallons per minute of water contaminated with a maximum concentration of petroleum hydrocarbons of 4,037.5 ug/L, and 700 gallons per minute of water contaminated with a maximum concentration of 1,2-DCA of 50 ug/L. This is equivalent to VOC, single HAP, and total HAPs emissions of 11.50, 0.421, and 0.658 tons per year, respectively.

Compliance with above conditions shall limit the source-wide VOC, single HAP, and total HAPs emissions to less than 100, 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to 326 IAC 6-5, for fugitive particulate matter emissions, because the fugitive particulate matter emissions from this source are less than 25 tons per year.

State Rule Applicability - Individual Facilities

There are no new state rules determined as applicable to individual facilities at this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 141-5556-00016; issued on March 9, 1998.

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

Pursuant to CP 141-3103-00016, issued on September 29, 1993, the VOC emissions from the one (1) soil vapor extraction system (North System) is subject to this rule. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). The soil vapor extraction system (North System) was constructed in 1993 and has the potential VOC emissions greater than 25 tons per year, therefore this rule applies. IDEM determined that using the natural gas-fired recuperative catalytic incineration system rated at 98% overall control efficiency, with catalyst inlet temperature at a minimum of 600 ^{o}F is BACT for the soil vapor extraction system (North System). The PTE VOC after control is less than 2.73 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are satisfied.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Petroleum liquid storage tanks identified as Tank 2, 4 and 7, each with a capacity greater than 39,000 gallons containing volatile organic liquid whose true vapor pressure is greater than 1.52 pounds per square inch (psi) are subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities). All other storage tanks at the source are not subject to the requirements of 326 IAC 8-4-3. Storage tanks Nos. 1, 3 and 5, each store petroleum liquid whose true vapor pressure is less than 1.52 psi and therefore, not subject to the rule. Storage tank Nos. 8, 9, 9a, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19 and 20, each has a capacity less than 39,000 gallons, therefore the rule does not apply.

Pursuant to 326 IAC 8-4-3, Tanks 2, 4, and 7 are subject to the following:

(a) The facility must be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.

(b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

(c) All openings, except stub drains, are equipped with covers, lids, or seals such that:

(1) the cover, lid, or seal is in the closed position at all times except when in actual use;
(2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
(3) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

Additionally, pursuant to 326 IAC 8-4-3, the Permittee shall maintain records including the following:

(a) the types of volatile petroleum liquids stored;
(b) the maximum true vapor pressure; and
(c) records of the inspections.

Tanks 2, 4 and 7, each with an external floating roof are in compliance with this rule.

326 IAC 8-4-4 (Bulk Gasoline Terminals)

Pursuant to 326 IAC 8-4-1, the loading of gasoline into any transports at this source is subject to the requirements of 326 IAC 8-4-4 (Bulk Gasoline Terminals) because the source is a bulk gasoline terminal (having a FESOP limited daily gasoline throughput of approximately 485,482 gallons per day which is greater than the 20,000 gallons per day threshold to meet the definition of bulk gasoline terminal). The source will comply with the requirements of this rule because the loading rack is equipped with an approved control system (Vapor Recovery Unit (VRU)) to control VOC emissions to less than 35 mg/l of gasoline loaded (equivalent to overall VOC control efficiency (including capture and destruction efficiencies) of 98.6%), which meets the required less than 80 mg/l VOC concentration.

326 IAC 8-4-5 (Bulk Gasoline Plants)

The source is not subject to the requirements of 326 IAC 8-4-5 (Bulk Gasoline Plants) since the source does not meet the definition of a bulk gasoline plant, which requires a daily gasoline throughput of less than 20,000 gallons per day.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

The source is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities), because the source does not dispense gasoline into motor vehicle fuel tanks or portable containers and is not a gasoline dispensing facility.

326 IAC 8-4-7 (Gasoline Transports)

The source is not subject to the requirements of 326 IAC 8-4-7 (Gasoline Transports), because it is not an owner or operator of a gasoline transport.

326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems; Records)

Pursuant to 326 IAC 8-4-9, sources subject to the requirements of 326 IAC 8-4-4 are also subject to the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems, Records). Pursuant to this rule, the source will comply with the requirements of this rule because the loading rack is equipped with a collection system (VRU), which has been demonstrated to have a VOC capture efficiency of 99.12%. The source will operate the vapor collection system in accordance with the specified workpractice standards and will maintain the required records associated with the operation of the vapor collection and vapor control systems (VRU).

326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source constructed before the rule applicability date of October 7, 1974, is not subject to this rule.

Testing Requirements

Testing requirement from previous approval was incorporated into this FESOP. The compliance stack test shall be performed between November 28, 2005 and May 28, 2006 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days at the vapor recovery unit (VRU) to demonstrate compliance with 40 CFR Part 60, subpart XX. This test shall be performed according to 40 CFR 60, Appendix A, Methods 25 and 25A.

Previous stack test to comply with this requirement was conducted as follows:

(a) VOC emissions testing was performed on November 28, 2000.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP, except the frequency for liquid leaks checks for the loading rack have been changed to "monthly" from "daily".

Reason changed: Pursuant to 40 CFR 60.502(j), Subpart XX, the liquid leaks checks for the loading rack are required on a monthly basis. Therefore, the liquid leaks checks frequency is being changed from “daily” to “monthly” during this permit renewal process.

The compliance monitoring requirements applicable to this source are as follows:

1. The operation of the loading rack has applicable compliance monitoring conditions as specified below:

   (a) Immediately before the performance test required to determine compliance with 40 CFR 60.502 (b), (c), and (h), the Permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The Permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

   (b) The Permittee shall determine compliance with the standards in 40 CFR 60.502 (b) and (c) using the testing procedures pursuant to 40 CFR 60.503 (c)(1) through (7).

   (c) The Permittee shall determine compliance with the standard in 40 CFR 60.502 (h) using the testing procedures pursuant to 40 CFR 60.503 (d)(1) and (2).

   (d) The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.

   (e) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:

      (1) Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.
      (2) Tank owner and address.
      (3) Tank identification number.
      (4) Testing location.
      (5) Date of test.
      (6) Tester name and signature.
      (7) Witnessing inspector, if any: Name, signature, and affiliation.
      (8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).

   (f) A record of each monthly leak inspection required under 40 CFR 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:

      (1) Date of inspection.
      (2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
      (3) Leak determination method.

(4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
(5) Inspector name and signature.

(g) The terminal owner or operator shall keep documentation of all notifications required under 40 CFR 60.502(e)(4) on file at the terminal for at least 2 years.

(h) The Permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.

(i) Monthly checks for liquid leaks during loading or unloading operations of the Loading Rack, the vapor collection system and the vapor recovery unit (VRU) shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid leaks and the date of such leaks. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a liquid leak is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

These monitoring conditions are necessary because the limits on the tank truck loading rack are needed to ensure compliance with 326 IAC 2-8 (FESOP) and to ensure compliance with 326 IAC 8-4-4 (Bulk Gasoline Terminals) and 40 CFR 60.500, Subpart XX).

Conclusion

The operation of this bulk petroleum storage and transfer terminal shall be subject to the conditions of the attached proposed FESOP No.: F141-16296-00016.

Appendix A: Emission Calculations

Company Name: BP Products North America - Granger Terminal
Address City IN Zip: 12694 Adams Road, Granger, IN 46530
FESOP: F141-16296-00016
Reviewer: Adeel Yousuf / EVP
Date: 04/21/03

Total Potential To Emit (tons/year)

	Emissions Generating Activity					
Pollutant	Storage Tanks	Loading Rack	Air Strippers	Soil Vapor Extraction System North System	Insignificant Activities	**TOTAL**
PM	0.00	0.00	0.00	0.03	0.00	0.03
PM10	0.00	0.00	0.00	0.03	0.00	0.03
SO2	0.00	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.91	0.00	0.91
VOC	8.14	616.16	11.50	137.00	5.64	778.44
CO	0.00	0.00	0.00	0.37	0.00	0.37
total HAPs	0.77	35.64	0.66	7.84	0.32	45.23
worst case single HAP	0.21 (Xylene)	22.44 (Hexane)	0.42 (Hexane)	5.01 (Hexane)	0.20 (Hexane)	28.28 (Hexane)

Total emissions based on rated capacities at 8,760 hours/year.

Limited Potential To Emit (tons/year)

	Emissions Generating Activity					
Pollutant	Storage Tanks	Loading Rack	Air Strippers	Soil Vapor Extraction System North System	Insignificant Activities	**TOTAL**
PM	0.00	0.00	0.00	0.03	0.00	0.03
PM10	0.00	0.00	0.00	0.03	0.00	0.03
SO2	0.00	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.91	0.00	0.91
VOC	8.14	34.51	11.50	2.74	5.64	62.53
CO	0.00	0.00	0.00	0.37	0.00	0.37
total HAPs	0.77	2.20	0.66	0.16	0.32	< 25.0
worst case single HAP	0.21 (Xylene)	1.11 (Hexane)	0.42 (Hexane)	0.10 (Hexane)	.20 (Hexane)	< 10.0

Total emissions based on rated capacities at 8,760 hours/year.

* Single HAP and total HAPs emissions are limited to less than 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8-4.

Appendix A: Emission Calculations
Tank VOC Emissions - Maximum PTE

Company Name: **BP Products North America - Granger Terminal**
Address City IN Zip: **12694 Adams Road, Granger, IN 46530**
FESOP: **F141-16296-00016**
Reviewer: **Adeel Yousuf / EVP**
Date: **April 21, 2003**

Tank	Product	Losses (Tons per Year)				Total VOC
ID	Stored	Breathing	Working	Standing	Withdrawal	Tons/yr
External Floating Roof Tanks:						
2	Gasoline	--	--	0.60	0.35	0.95
4	Gasoline	--	--	0.52	0.44	0.97
7	Gasoline	--	--	2.08	0.44	2.52
Vertical Fixed Roof Tanks:						
1	Distillate	0.11	0.88	--	--	0.99
3	Distillate	0.14	0.98	--	--	1.12
6	Distillate	0.05	0.80	--	--	0.85
Horizontal Fixed Roof Tanks:						
8	gasoline additive	0.0002	0.0005	--	--	0.00
10	slop	0.1801	0.5429	--	--	0.72
20	diesel additive	0.0052	0.0135	--	--	0.01
Total VOC		0.48	3.23	3.20	1.24	8.14

Note: All storage tank emissions estimated using USEPA's Tanks 4.09 software program and are based on the estimated maximum annual throughput for each fuel/additive.

Appendix A: Emission Calculations
Process Fugitive

Company Name: BP Products North America - Granger Terminal
Address City IN Zip: 12694 Adams Road, Granger, IN 46530
FESOP: F141-16296-00016
Reviewer: Adeel Yousuf / EVP
Date: April 21, 2003

Component Type	Service	Avg. Emission Factor	Quantity*	VOC Emissions (lb/hr)	VOC Emissions (tons/yr)
		(lb/hr/unit)			
Fittings (connectors, flanges)	Light Liquid	1.76E-05	600	0.011	0.05
Others (compressors, relief valves	Light Liquid	2.87E-04	2	0.001	0.00
Pumps	Light Liquid	1.19E-03	9	0.011	0.05
Valves	Light Liquid	9.48E-05	135	0.013	0.06
Load Arms	Light Liquid	2.866E-04	10	0.003	0.01
Total				**0.03**	**0.16**

Note: Emission factors are taken from: U.S. EPA. Office of Air Quality Planning and Standards. Protocol for Equipment Leak Emission Estimates. (Research Triangle Park, NC: U.S. EPA EPA-453/R-95-017, 1995). Table 2-3

Methodology:

VOC Emssions (tpy) = Quantiy x Emission Factor x (1 ton/ 2000 lb) x (8760 hr / 1 yr)

Appendix A: Emission Calculations
VOC Emissions

Company Name: BP Products North America - Granger Terminal
Address City IN Zip: 12694 Adams Road, Granger, IN 46530
FESOP: F141-16296-00016
Reviewer: Adeel Yousuf / EVP
Date: April 21, 2003

A. Significant Units

Source Type	Pollutant	Gas Flow Rate (acfm)	Potential VOC Emissions (tons/yr)	Control Efficiency (%)	Controlled VOC Emissions (tons/yr)
Two (2) Air Strippers (S/V 001A and 001B)	VOC	7200	11.5	0	11.50
Soil Vapor Extraction System (North System)	VOC	2000	137	98	2.74
Total			148.5		14.24

Note: VOC Emissions from the 2 Air Strippers and the soil vapor extraction system are obtained from the original FESOP 141-5556-00016 and were provided by the source.

B. Insignificant Activities

Source Type	Pollutant	Gas Flow Rate (acfm)	VOC Emissions (lb/day)	VOC Emissions (tons/yr)
Oil/Water Separator	VOC	N/A	15	2.738
Maintenance Activities	VOC	N/A	15	2.738
Total				5.48

Methodology:

Note: Oil/Water Separator, Maintenance activities and Soil Vapor Extraction System emissions are obtained from the original FESOP 141-5556-00016 and represent the maximum insignficant threshold emissions of 15 pounds per day.

Maximum Potential HAP Emission Calculations

Company Name: **BP Products North America - Granger Terminal**
Address City IN Zip: **12694 Adams Road, Granger, IN 46530**
FESOP: **F141-16296-00016**
Reviewer: **Adeel Yousuf / EVP**
Date: **April 21, 2003**

Gasoline

Pollutant HAP to VOC Emission Factor (% by wt.)		Hexane 3.66%	Benzene 0.37%	Toluene 0.73%	Iso-Octane 0.71%	Xylenes 0.23%	EthylBenzene 0.02%	Methanol 0.00%	Total HAPs
	Maximum VOC Emissions (tpy)								
Tank 2	0.95	3.48E-02	3.52E-03	6.94E-03	6.75E-03	2.19E-03	1.90E-04	0.00E+00	5.43E-02
Tank 4	0.97	3.55E-02	3.59E-03	7.08E-03	6.89E-03	2.23E-03	1.94E-04	0.00E+00	5.55E-02
Tank 7	2.52	9.22E-02	9.32E-03	1.84E-02	1.79E-02	5.80E-03	5.04E-04	0.00E+00	1.44E-01
Loading Rack	607.73	2.22E+01	2.25E+00	4.44E+00	4.31E+00	1.40E+00	1.22E-01	0.00E+00	3.48E+01
Fugitives (Loading Rack)	5.35	1.96E-01	1.98E-02	3.91E-02	3.80E-02	1.23E-02	1.07E-03	0.00E+00	3.06E-01
Two (2) Air Strippers *	11.5	4.21E-01	4.26E-02	8.40E-02	8.17E-02	2.65E-02	2.30E-03	0.00E+00	6.58E-01
Soil vapor extraction system	137	5.01E+00	5.07E-01	1.00E+00	9.73E-01	3.15E-01	2.74E-02	0.00E+00	7.84E+00
Insignificant Activities *	5.64	2.06E-01	2.09E-02	4.12E-02	4.00E-02	1.30E-02	1.13E-03	0.00E+00	3.23E-01
	Total (tpy)	2.82E+01	2.86E+00	5.63E+00	5.48E+00	1.77E+00	1.54E-01	0.00E+00	4.41E+01

* As a worst scenario, it is assumed that emissions from two air strippers and insignificant activities consist of gasoline emissions.

Distillate (Diesel/Kerosene)

Pollutant HAP to VOC Emission Factor (% by wt.) **		Hexane 1.43%	Benzene 0.67%	Toluene 6.28%	Iso-Octane 0.00%	Xylenes 7.14%	EthylBenzene 1.97%	Methanol 0.00%	Total
	Maximum VOC Emissions (tpy)								
Tank 1	0.99	1.42E-02	6.63E-03	6.22E-02	0.00E+00	7.07E-02	1.95E-02	0.00E+00	1.73E-01
Tank 3	1.12	1.60E-02	7.50E-03	7.03E-02	0.00E+00	8.00E-02	2.21E-02	0.00E+00	1.96E-01
Tank 6	0.85	1.22E-02	5.70E-03	5.34E-02	0.00E+00	6.07E-02	1.67E-02	0.00E+00	1.49E-01
Loading Rack	3.06	4.38E-02	2.05E-02	1.92E-01	0.00E+00	2.18E-01	6.03E-02	0.00E+00	5.35E-01
Fugitives (Loading Rack)	0.03	4.29E-04	2.01E-04	1.88E-03	0.00E+00	2.14E-03	5.91E-04	0.00E+00	5.25E-03
	Total (tpy)	8.65E-02	4.05E-02	3.80E-01	0.00E+00	4.32E-01	1.19E-01	0.00E+00	1.06E+00

** Worst case HAP content is used from Diesel and Kerosene HAP contents.

Grand Total (tpy)	**28.33**	**2.90**	**6.01**	**5.48**	**2.21**	**0.27**	**0.00**	**45.20**

Single HAP and total HAPs shall be limited to 10 and 25 tons per year, respectively. Therefore, the requirements fo 326 IAC 2-7 do not apply.

METHODOLOGY

HAPS emission rate (tons/yr) = Max. VOC emissions (tpy) * Weight % HAP * 1 ton/2000 lbs

Controlled or Limited HAP Emission Calculations

Company Name: BP Products North America - Granger Terminal
Address City IN Zip: 12694 Adams Road, Granger, IN 46530
FESOP: F141-16296-00016
Reviewer: Adeel Yousuf / EVP
Date: April 21, 2003

Gasoline

Pollutant HAP to VOC Emission Factor (% by wt.)		Hexane 3.66%	Benzene 0.37%	Toluene 0.73%	Iso-Octane 0.71%	Xylenes 0.23%	EthylBenzene 0.02%	Methanol 0.00%	Total HAPs
	Maximum VOC Emissions (tpy)								
Tank 2	0.95	3.48E-02	3.52E-03	6.94E-03	6.75E-03	2.19E-03	1.90E-04	0.00E+00	5.43E-02
Tank 4	0.97	3.55E-02	3.59E-03	7.08E-03	6.89E-03	2.23E-03	1.94E-04	0.00E+00	5.55E-02
Tank 7	2.52	9.22E-02	9.32E-03	1.84E-02	1.79E-02	5.80E-03	5.04E-04	0.00E+00	1.44E-01
Loading Rack	26.07	9.54E-01	9.65E-02	1.90E-01	1.85E-01	6.00E-02	5.21E-03	0.00E+00	1.49E+00
Fugitives (Loading Rack)	3.06	1.12E-01	1.13E-02	2.23E-02	2.17E-02	7.04E-03	6.12E-04	0.00E+00	1.75E-01
Two (2) Air Strippers *	11.5	4.21E-01	4.26E-02	8.40E-02	8.17E-02	2.65E-02	2.30E-03	0.00E+00	6.58E-01
Soil vapor extraction system	2.74	1.00E-01	1.01E-02	2.00E-02	1.95E-02	6.30E-03	5.48E-04	0.00E+00	1.57E-01
Insignificant Activities *	5.64	2.06E-01	2.09E-02	4.12E-02	4.00E-02	1.30E-02	1.13E-03	0.00E+00	3.23E-01
	Total (tpy)	1.96E+00	1.98E-01	3.90E-01	3.79E-01	1.23E-01	1.07E-02	0.00E+00	3.06E+00

* As a worst scenario, it is assumed that emissions from two air strippers and insignificant activities consist of gasoline emissions.

Distillate (Diesel/Kerosene)

Pollutant HAP to VOC Emission Factor (% by wt.) **		Hexane 1.43%	Benzene 0.67%	Toluene 6.28%	Iso-Octane 0.00%	Xylenes 7.14%	EthylBenzene 1.97%	Methanol 0.00%	Total
	Maximum VOC Emissions (tpy)								
Tank 1	0.99	1.42E-02	6.63E-03	6.22E-02	0.00E+00	7.07E-02	1.95E-02	0.00E+00	1.73E-01
Tank 3	1.12	1.60E-02	7.50E-03	7.03E-02	0.00E+00	8.00E-02	2.21E-02	0.00E+00	1.96E-01
Tank 6	0.85	1.22E-02	5.70E-03	5.34E-02	0.00E+00	6.07E-02	1.67E-02	0.00E+00	1.49E-01
Loading Rack	3.06	4.38E-02	2.05E-02	1.92E-01	0.00E+00	2.18E-01	6.03E-02	0.00E+00	5.35E-01
Fugitives (Loading Rack)	0.03	4.29E-04	2.01E-04	1.88E-03	0.00E+00	2.14E-03	5.91E-04	0.00E+00	5.25E-03
	Total (tpy)	8.65E-02	4.05E-02	3.80E-01	0.00E+00	4.32E-01	1.19E-01	0.00E+00	1.06E+00

** Worst case HAP content is used from Diesel and Kerosene HAP contents.

Grand Total (tpy)	**2.04**	**0.24**	**0.77**	**0.38**	**0.55**	**0.13**	**0.00**	**4.12**

Single HAP and total HAPs shall be limited to 10 and 25 tons per year, respectively. Therefore, the requirements fo 326 IAC 2-7 do not apply.

METHODOLOGY

HAPS emission rate (tons/yr) = Max. VOC emissions (tpy) * Weight % HAP * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: BP Products North America - Granger Terminal
Address City IN Zip: 12694 Adams Road, Granger, IN 46530
FESOP: F141-16296-00016
Reviewer: Adeel Yousuf / EVP
Date: 04/21/03

Unit	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Recuperative catalytic incineration system for soild vapor extraction system	1.00	8.8

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.008	0.033	0.003	0.438	0.024	0.368

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

LPG-Propane - Industrial Boilers

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Sulfur Content =	0.00 grains/100ft^3
1.00	95.74		

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.6	0.6	0.0 *(0.10S)*	19.0	0.5 **TOC value	3.2
Potential Emission in tons/yr	0.029	0.029	0.000	0.910	0.024	0.153

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.
**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Total (Worst Case) (tons/yr)			**0.029**	**0.033**	**0.003**	**0.910**	**0.024**	**0.368**

Methodology
1 gallon of LPG has a heating value of 94,000 Btu
1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)
(Source - AP-42 (Supplement B 10/96) page 1.5-1)
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu
Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Appendix A: Emission Calculations
Emissions from Truck Loading Operations

Company Name: BP Products North America - Granger Terminal
Address City IN Zip: 12694 Adams Road, Granger, IN 46530
FESOP: F141-16296-00016
Reviewer: Adeel Yousuf / EVP
Date: April 21, 2003

Uncontrolled VOC Emissions

Material Loaded	C Maximum Throughput kgal/yr *	D Saturation Factor (S)	E MW lb/lb-mole	F Temperature F	G TVP psi	H AP-42 Emission Factor (lb/kgal) 12.46xD x E x G/(F +460)	Maximum Uncontrolled Loading Losses (tons/yr) CxH/2000
Petroleum Products (Gasoline)	177,201	1.0	66	49.07	4.2461	6.8592	607.73
Distillates	400,000	1.0	130	49.07	0.0048	0.0153	3.06
Total							**610.79**

Notes:
Emission factor in pounds per thousand gallons loaded, based on AP-42, Table 5.2-1, 5th Ed, 1995.

Fugitive VOC Emissions

Material Loaded	A Maximum Throughput kgal/yr *	B Maximum Uncontrolled Loading Losses (tons/yr)	C Capture Efficiency	Limited Fugitive Loading Losses (tons/yr) B x (1-C)
Petroleum Products (Gasoline)	177,201	607.73	99.12%	5.35
Distillates	400,000	3.06	99.12%	0.03
Total				**5.37**

* Throughputs are based on the facility's maximum loading capacity determined through a stack test performed on November 28, 2000.
Note: Capture effeciency for Truck Loading Vapor Recovery Unit is estimated to be 99.12%, which is based on Bay Area Air Quality Management District (BAAQMD), and EPA Transport Truck Studies (EPA-450/3-79-018) and BP's data. Same capture effeciency was used in the original FESOP 141-5556-00016, issued on March 9, 1998

Appendix A: Emission Calculations

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Emissions from Truck Loading Operations

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Date: April 21, 2003

VCU Controlled VOC Emissions

Material Loaded	Maximum Throughput kgal/yr *	Uncontrolled Loading Losses (tons/yr)	Permit Limit for Loading mg/l	Control Efficiency %	Lim. VCU Emissions (tons/yr)
Petroleum Products (Gasoline)	177,201	607.73	35	95.71%	26.07
Distillates	400,000	3.06	No Limit	0.00%	3.06
Total					29.13

Notes:
* Throughputs are based on the facility's maximum loading capacity determined through a stack test performed on November 28, 2000.
VCU Emissions from Gasoline Loading (lb/yr) = Uncontrolled Loading Loss (tons/yr) * (1 - Control Efficiency)

Total VOC Emissions from Loading Rack

Material Loaded	Limited VCU Emissions (tons/yr)	Lim. Fugitive Loading Losses (tons/yr)	Limited Total (tons/yr)
Petroleum Products (Gasoline)	26.07	5.35	31.42
Distillates	3.06	0.03	3.09
Total	**29.13**	**5.37**	**34.51**